Exhibit 3 to Frawley
Declaration in Opposition to
Google's Motion to Exclude
Plaintiffs' Expert Bruce
Schneier GOOGCABR-00111416

Redacted Version of Document Sought to Be Sealed



## **Outline**

- Why Trust
- User problems
- Strategic context
- Product proposals (2019 + 2023)
- Things we considered and disregarded
- Open questions
- Measuring trust

## Why is Trust Important

Trust is important to users because it enables them to get the most out of their web browsing experience in Chrome. When users trust Chrome with their data and their identity, Chrome can unlock many useful features and help users in a more personalized way. When users feel safe on the web, that allows them to get more done without worrying about being compromised.

Trust is important to Chrome because it enables us to ship differentiated features leveraging Google services. It further enhances its image as a secure and safe browser. Users are increasingly aware of the privacy, security, and safety aspects related to their online activities. As human dependence on technology grows, the need and challenge of building trustworthy products will also increase.

User trust is also an important theme for Google as a whole in 2019. From Sundar's "My heading in 2018" email:

"Safeguarding our users and their data: User trust is the foundation for everything we do and privacy and security are core ... we need to step up even more and think about how we can make things much simpler for people to understand and make important decisions around their data. This will be one of our most important focus areas in 2019 and we're committed to redoubling our efforts here."

